

This correspondence contains comments on Petition RM-10867 submitted by the ARRL and received by the Commission on March 18, 2004. With this petition, the ARRL is asking the Commission to modify licensing requirements within the Amateur Radio Service.

I am an amateur radio operator (call sign K3WQ) and a member of the ARRL.

Although I favor elimination of demonstrated ability in Morse code as a requirement for any class of amateur radio license, I find the licensing structure and attendant testing requirements proposed by the ARRL to be reasonable. It would therefore be reasonable for the Commission to implement the modifications to Part 97 listed in the petition's appendix.

I would like to suggest two minor changes to the proposal:

First, the exam for the "new" Novice license proposed by the ARRL should be comprised of, say, 35 questions to make the level of effort required to earn it comparable to that for the "old" Novice license, which required passing a 25-question written exam and a telegraphy exam.

Second, more descriptive names should be adopted for the three classes of license. For example, "Basic," "Intermediate" and "Full" in lieu of "Novice," "General" and "Extra," respectively. These would be more indicative of the license hierarchy. Furthermore, the name "Basic" would replace the pejorative and ultimately inaccurate term of "Novice," as some licensees never obtain a higher class of license, but nevertheless become competent, experienced operators. (Other appropriate names for the entry-level license are "Limited," "Restricted" and "Foundation.") Such new names can be assigned unique, single-character designators different from the ones currently used in the Commission's database without requiring a costly effort to modify software. For example, the designators "B," "I" and "F" could be used in lieu of, or in addition to, "N," "T," "P," "G," "A," and "E" that currently appear in the database.

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